

EXHIBIT I –
Declaration of
Amy Katherine Taylor

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

ENVIGO RMS, LLC,

Defendant.

**DECLARATION OF AMY KATHERINE
TAYLOR**

I, Amy Katherine Taylor, declare the following to be true and correct to the best of my knowledge and based on my personal knowledge and on information collected from staff:

1. I am employed with the Virginia Office of the Attorney General as an Investigator in the Animal Law Unit. I have been an Investigator with the Office of the Attorney General since 2020. As an Investigator, I investigate animal crimes that occur within the Commonwealth of Virginia and analyze evidence. I also provide training and education for law enforcement, animal control, and prosecutors.

2. I have been involved in the Virginia Animal Fighting Task Force since 2007 in various capacities. I have been an investigator since 2007, a field investigation and response supervisor since 2011, and on the Board of Directors since 2013. In my role on the Virginia Animal Fighting Task Force, I provide training and education for law enforcement, animal control, and prosecutors.

3. Since 2004, I have completed extensive trainings and continuing education courses in topics such as animal welfare, advanced techniques for dog fighting

prosecutions, and animals as evidence.

4. I have taught classes for animal control officers on animal cruelty and common animal diseases.

5. I am the lead building and enclosure assessor assisting the United States in the execution of the federal warrant at the Cumberland, Virginia facility for Envigo RMS. As the lead building and enclosure assessor, I am responsible for leading the team that will conduct the evaluations of the individual buildings and individual enclosures at the Cumberland facility.

6. On May 18, 2022, I did an initial walk through of all buildings containing beagles at the Cumberland facility.

7. During my initial walk through, I observed that a number of the buildings had numerous empty enclosures.

8. On May 18, 2022, I evaluated building G2. I observed that building G2 was extremely pungent and contained large amount of feces in the outdoor kennel areas. Bugs were present in many of the enclosures in this building.

9. In the process of evaluating individual enclosures in building G2, I observed many enclosures that were overcrowded with beagles. For example, in an enclosure measuring 39.8 square feet I saw 10 beagles. In another enclosure, I observed 10 beagles inside of an enclosure measuring 39.8 square feet.

10. I observed enclosures with welded bars used for the enclosure walls that contained such wide gaps that animals could be injured. In one enclosure, I found a beagle with its jaw stuck within the welded bars.

11. I observed widespread problems with the flooring in the enclosures. In multiple

enclosures, I observed that when animals were on the flooring, the flooring began to move up and down with the weight of the animals.

12. I repeatedly observed beagles who had gotten their feet trapped in the flooring of the enclosures. On at least six different occasions, I opened a cage to free a beagle who had gotten its feet stuck in the flooring.

13. Some enclosures housing puppies contained black mats that covered the flooring in these enclosures. In one enclosure, I observed that the rubber mat did not cover the entire floor which could allow for puppies' feet to pass through the holes in the flooring. I observed that in some of these enclosures, the black mats had been pulled back and there were gaps in the flooring that the puppies could fall through. In one enclosure, the black mat had been pulled back such that it exposed half of the flooring, which contained gaps that puppies could fall through. One such black mat had a hole in it, and did not cover the entire crate. In other enclosures, I saw gaps between the black mat and the edge of the enclosure. In these gaps, I observed puppies' feet passing through and puppies' feet getting trapped. In one instance, I opened an enclosure and freed a puppy whose feet had gotten trapped in the gap between the black mat and the edge of the enclosure.

14. I observed gaps of up to 1.5 inches between the flooring and the edge of the enclosure. These gaps were large enough to allow for a beagle's feet or toes to pass through or get stuck.

15. I saw widespread fighting between beagles. I observed fighting occurring between beagles contained in the same cage. In one enclosure, I observed two dogs attacking each other on the ground of the enclosure. In that same enclosure, I saw one beagle eating out of the only food receptacle in the enclosure and, when other beagles tried to approach the food

receptacle, the beagle attacked in an aggressive manner.

16. I also observed fighting between beagles located in separate, adjacent enclosures. In these instances, I observed beagles stand on their hind legs to physically attack beagles located in adjacent enclosures through openings in the partition between the enclosures. I only saw one solid partition wall between adjacent enclosures. In the remaining enclosures I observed, the enclosures did not contain a solid partition wall to prevent beagles located in adjacent enclosures from physically accessing and attacking each other.

17. In all enclosures, I observed that water was being distributed to the beagles using a spigot/nozzle system. Each enclosure, regardless of how many dogs were in the enclosure, only contained one spigot.

18. In multiple enclosures containing puppies, I observed that the puppies could not access the spigot to get water on their own. I held down the spigot to release water, and puppies immediately rushed to the spigot to get water, and drank heavily and quickly.

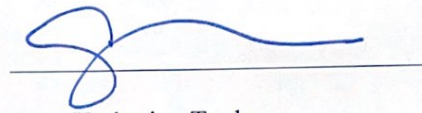
19. I repeatedly observed food receptacles with mold under the feeder and build-up of what appeared to be old food near and along the edge of the feeder. For a number of feeders, the lid was either broken or did not close.

20. I observed that each food receptacle in each enclosure contained the same food. I observed that adult dogs, nursing mothers, and young puppies were all eating the same food.

21. In each enclosure, I only observed one feeder. The feeders were of a shape and size that only allowed for one beagle head to access at one time. In at least two of the enclosures, the feeders had sharp edges.

Under penalty of perjury, pursuant to 28 U.S.C. § 1746(2), I declare the foregoing to be true and correct to the best of my knowledge.

Executed on May 19, 2022.



Amy Katherine Taylor